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May 25, 2023

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MAM**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of March 6, 2023, we are providing a joint status report.

The parties have now entered the final stage of the Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). A settlement outreach has been launched to customers who were identified through a deliberate process as potentially part of Plaintiffs' putative class and will now be offered individual settlements. We anticipate a swift response period. We therefore respectfully request that Your Honor allow us to report back in July 2023.

Respectfully,

/s/ James J. O'Hara

JAMES J. OHARA

*On behalf of Defendant,  
Samsung Electronics America, Inc.*

Respectfully,

/s/ Jonathan Shub

*On behalf of Plaintiffs*

**SO ORDERED:**

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)

s/ Michael A. Hammer

Hon. Michael A. Hammer, U.S.M.J.

**Dated:** May 26, 2023

**The parties shall file the next joint status report  
by or before July 14, 2023.**